

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

THE TRUSTEES OF PRINCETON
UNIVERSITY,

Plaintiff,

v.

TOD WILLIAMS BILLIE TSIEN
ARCHITECTS, LLP; JACOBS
ARCHITECTS/ENGINEERS, INC.;
and JACOBS CONSULTANCY INC.,

Defendants.

TOD WILLIAMS BILLIE TSIEN
ARCHITECTS, LLP,

Defendant/
Third-Party Plaintiff,

v.

ARUP, USA, INC., THE
BALLINGER COMPANY, SEVERUD
ASSOCIATES CONSULTING
ENGINEERS, P.C., FISHER
MARANTZ STONE, FRANK HUBACH
ASSOCIATES, INC., F.J. SCIAME
CONSTRUCTION COMPANY, INC.,
JOHN DOES 1-10 and ABC
CORPORATIONS 1-10,

Third-Party Defendants.

**DEFENDANT TOD WILLIAMS BILLIE TSIEN ARCHITECTS, LLP'S NOTICE OF
MOTION FOR LEAVE TO FILE AN AMENDED THIRD-PARTY COMPLAINT, AND
ANSWER TO CROSS-COMPLAINT WITH THIRD-PARTY COMPLAINT, AND ANSWER
TO COUNTERCLAIM WITH THIRD-PARTY COMPLAINT**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, on Monday, July 6, 2020, defendant Tod Williams Billie Tsien Architects, LLP, through their undersigned counsel Thompson Becker, L.L.C., will move before the Honorable Lois H. Goodman, U.S.M.J., at the Clarkson S. Fisher Federal Building & U.S. Courthouse, Room 7050, 402 E. State Street, Trenton, NJ 08608, for an Order granting defendant leave to file:

1. an Amended Third-Party Complaint joining additional parties in this matter in substantially the same form as Exhibit "A"; and
2. an Answer to the Cross-Complaint by defendants Jacobs Architects/Engineers, Inc. and Jacobs Consultancy, Inc. and Third-Party Complaint in the same form as Exhibit "B"; and
3. an Answer to the Counterclaim by third-party Arup, USA, Inc. and Third-Party Complaint in the same form as Exhibit "C".

PLEASE TAKE FURTHER NOTICE that in support of this motion, defendant will rely on their Brief in Support of the Motion for Leave to Amend, the accompanying Certification of Counsel, and all documents attached thereto.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 7.1(e), a proposed form of Order is submitted herewith for the Court's consideration.

Respectfully submitted,

THOMPSON BECKER, L.L.C.
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Tod Williams Billie Tsien Architects,
LLP

Dated: June 12, 2020

By:


John M. Becker, Esquire